

In the Matter of
Case No. 23-Civ-6252 (JPC)

KRIMSKY
v.
WESTROCK COMPANY, et al.

Examination of Tammy M. Siracusa

Tuesday, July 30, 2024

CONDENSED



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KRIMSKY v. WESTROCK COMPANY, et al.
Tammy Siracusa --- July 30, 2024

<p>UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK</p> <p>MARSHALL KRIMSKY, Plaintiff, Case No. 23-Civ-6252 (JPC) -against- WESTROCK COMPANY and WESTROCK SERVICES, LLC, Defendants.</p> <p>July 30, 2024 9:33 a.m.</p> <p>REMOTE EXAMINATION BEFORE TRIAL VIA VIDEOCONFERENCE of the Defendants herein, by a Witness, TAMMY M. SIRACUSA, taken by FRANCES CODD SLUSARZ, in the above-entitled action, held at the above time, pursuant to Notice, taken before DEVORA HACKNER, a Stenographic Reporter and Notary Public within and for the State of New York.</p>	<p>2</p> <p>1 A P P E A R A N C E S: 2 GODDARD LAW PLLC 3 Attorneys for Plaintiff 4 39 Broadway 5 Suite 1540 6 New York, New York 10006 7 646-964-1178 8 BY: FRANCES CODD SLUSARZ, ESQ. frances@goddardlawnyc.com</p> <p>9 COZEN O'CONNOR 10 Attorneys for Defendants 11 175 Greenwich Street 12 55th Floor 13 New York, New York 10007 14 212-453-3978 15 BY: JANICE SUED AGRETTI, ESQ. jagresti@cozen.com</p> <p>16 ALSO PRESENT: 17 ANISSA FLOYD, ESQ. 18 WestRock Company 19 20 MARSHALL KRIMSKY 21 22 23 24 25</p>
<p>3</p> <p>1 F E D E R A L S T I P U L A T I O N S</p> <p>2</p> <p>3 IT IS HEREBY STIPULATED AND AGREED by 4 and between the attorneys for the respective 5 parties herein, that filing and sealing be and 6 the same are hereby waived.</p> <p>7</p> <p>8 IT IS FURTHER STIPULATED AND AGREED 9 that all objections, except as to the form of 10 the question, shall be reserved to the time of 11 the trial.</p> <p>12</p> <p>13 IT IS FURTHER STIPULATED AND AGREED 14 that the within deposition may be signed and 15 sworn to before any officer authorized to 16 administer an oath, with the same force and 17 effect as if signed and sworn to before the 18 Court.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>4</p> <p>1 T. M. SIRACUSA</p> <p>2 THE STENOGRAPHER: Will you 3 be ordering a copy of the 4 transcript?</p> <p>5 MS. AGRETTI: I will be, 6 yes.</p> <p>7 THE STENOGRAPHER: Good 8 morning. My name is Devora 9 Hackner. I am your remote 10 stenographic reporter.</p> <p>11 The parties are present via 12 videoconference to take the 13 deposition of Ms. Tammy M. 14 Siracusa in the matter of 15 Marshall Krimsky against WestRock 16 Company and WestRock Services, 17 LLC.</p> <p>18 Today's date is July 30, 19 2024 and the time is 9:33 a.m.</p> <p>20 This deposition is being 21 taken by means of 22 videoconference, and the oath 23 will be administered remotely by 24 me pursuant to Federal Rule of 25 Civil Practice 30(b) (4) and upon</p>

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<p>1 T. M. SIRACUSA 2 agreement and stipulation of all 3 counsel. 4 It's important that everyone 5 speak one at a time, as delays do 6 occur in transmission. 7 If there is no objection to 8 this remote proceeding, will the 9 parties please state their name, 10 beginning with the taking 11 attorney, and who they represent. 12 MS. SLUSARZ: My name is 13 Frances Slusarz. I consent. And 14 I represent the plaintiff, 15 Marshall Krimsky. 16 MS. AGRESTI: My name is 17 Janice Sued Agresti, from the law 18 firm of Cozen O'Connor. I 19 represent the defendants in this 20 matter. And we consent to this 21 deposition. 22 T A M M Y M. S I R A C U S A, the 23 witness herein, having been first duly 24 sworn by a Notary Public of the State of 25 New York, was examined and testified as</p>	<p>5 1 T. M. SIRACUSA 2 follows: 3 THE STENOGRAPHER: State 4 your name for the record, please. 5 THE WITNESS: Tammy M. 6 Siracusa. 7 THE STENOGRAPHER: State 8 your address for the record, 9 please. 10 THE WITNESS: XXXXXXXXXXXX 11 XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX 12 XXXXX. 13 MS. AGRESTI: Please mark 14 that confidential for the record. 15 THE STENOGRAPHER: Okay. 16 And are you in Georgia right 17 now? 18 THE WITNESS: Yes. 19 THE STENOGRAPHER: Counsel, 20 do we agree that I could take the 21 oath even she is out of the state 22 of New York? 23 MS. SLUSARZ: Yes. For 24 plaintiff. 25 MS. AGRESTI: Yes.</p>
<p>7 1 T. M. SIRACUSA 2 And just to confirm, just 3 'cause I didn't seek 4 confirmation, it's marked 5 confidential for the record, the 6 address? 7 THE STENOGRAPHER: Yes. Do 8 you want it redacted? 9 MS. AGRESTI: Redact it, 10 please. 11 MS. SLUSARZ: And I consent 12 to it being marked confidential. 13 Before we start, do we want 14 to agree to stipulations that 15 we'll only object as to the form 16 of the question and that your 17 client will read and sign? 18 MS. AGRESTI: Yes. We'll 19 reserve all objections except for 20 form. And then yes, read and 21 sign. Thank you. 22 MS. SLUSARZ: Okay. 23 EXAMINATION 24 BY MS. SLUSARZ: 25 Q. Good morning, Ms. Siracusa. My</p>	<p>7 1 T. M. SIRACUSA 2 name is Fran Slusarz. I'm an attorney 3 with Goddard Law PLLC. And we 4 represent Marshall Krimsky in a lawsuit 5 we brought against WestRock Company and 6 WestRock Services. 7 I'm going to ask you some 8 questions today about your experience 9 both with WestRock and with 10 Mr. Krimsky. And so just a couple of 11 things, some of the them that 12 Ms. Hackner has already mentioned. One 13 is that since she's taking down 14 everything we each say, it's important 15 that only one of us speaks at a time. 16 So please wait until I finish a 17 question before you answer it. And 18 I'll do my best not to cut you off. 19 It's also important that you 20 respond with words instead of like 21 gestures or uh-uhs or uh-huhs because 22 that also doesn't really translate into 23 a transcript. And if you don't 24 understand a question I ask, please ask 25 me to rephrase it. If you answer a</p>

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<p>1 T. M. SIRACUSA 2 question, I'm going to assume that you 3 understood what I was asking. 4 Now, do you have any medical 5 conditions that affect your ability to 6 recall and relay facts today? 7 A. No. 8 Q. Are you on any medication that 9 affects your ability to recall and 10 relay facts? 11 A. No. 12 Q. Are you currently under the 13 influence of any illicit drugs or 14 alcohol? 15 A. No. 16 Q. Do you know what it means to 17 give testimony under oath? 18 A. Yes. 19 Q. And what is your understanding? 20 A. I have to answer the questions 21 truthfully. 22 Q. Do you have any -- have you been 23 convicted of any crimes? 24 A. No. 25 Q. Have you ever been party to a</p>	<p>9 1 T. M. SIRACUSA 2 lawsuit? 3 A. No. 4 Q. Have you ever filed a -- you 5 know, complained about discrimination 6 at work? 7 A. No. 8 Q. Did you discuss today's 9 deposition with anybody? 10 A. My attorneys. The attorneys 11 here. 12 Q. And anyone else? 13 A. No. 14 Q. Did you review any documents to 15 prepare for today's deposition? 16 A. Yes. 17 Q. And what document did you 18 review? 19 A. It was a brief statement of some 20 of the concerns that were brought up 21 before. 22 Q. Who prepared the brief 23 statement? 24 A. The attorneys. 25 Q. What is the highest level of</p>
<p>11</p> <p>1 T. M. SIRACUSA 2 education that you have completed? 3 A. A bachelor's degree. 4 Q. And where did you get your 5 bachelor's? 6 A. At Le Moyne College. 7 Q. Where is that located? 8 A. Syracuse, New York. 9 Q. And what was the -- what did you 10 major in? 11 A. Business administration. 12 Q. Do you have any professional 13 licenses? 14 A. No. 15 Q. And what about any professional 16 certifications, like a trade group 17 certification? 18 A. No. 19 Q. What is your marital status? 20 A. I'm married. 21 Q. Do you have any children? 22 A. Yes. 23 Q. What are their ages? 24 A. Twenty-three and nineteen. 25 Q. What is your date of birth?</p>	<p>12</p> <p>1 T. M. SIRACUSA 2 --- 3 (Begin confidential 4 portion.) 5 --- 6 PII/Confidential 1967. 7 --- 8 (End confidential portion.) 9 10 MS. AGRETTI: Please mark 11 that confidential for the record. 12 Except for the year -- can I just 13 have 30 seconds here? Off the 14 record a minute. 15 --- 16 (Whereupon, an 17 off-the-record discussion was 18 held at this time.) 19 --- 20 MS. AGRETTI: We'll do the 21 separate page marked 22 confidential, please. Thank you. 23 Q. Okay. Ms. Siracusa, who is your 24 current employer? 25 A. Smurfit Westrock.</p>

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<p style="text-align: right;">13</p> <p>1 T. M. SIRACUSA 2 Q. And what is your job title? 3 A. Senior vice president of 4 merchandising displays and graphic 5 solutions. 6 Q. When did you become senior vice 7 president of merchandising displays and 8 graphic solutions? 9 A. December 2022. 10 Q. When did you first join Smurfit 11 Westrock or one of its predecessors? 12 A. 1993. 13 Q. Okay. Before you were senior 14 vice president of merchandising 15 displays and graphic solutions, what 16 was your title? 17 A. Senior vice president of east 18 region. 19 Q. And during what time frame were 20 you the senior vice president of the 21 east region? 22 A. From 2019 -- it might have been 23 2018. September of 2018 through 24 December of 2022. 25 Q. Who did you report to when you</p>	<p style="text-align: right;">14</p> <p>1 T. M. SIRACUSA 2 were the senior vice president of the 3 east region? 4 A. Pete Durette. 5 Q. And who do you report to now? 6 A. Don Sparaco. 7 Q. And what is Mr. Sparaco's title? 8 A. President of the corrugate 9 division. 10 Q. I realize I didn't ask this 11 before. In what year did you get your 12 bachelor's degree? 13 A. I graduated in 1989. 14 Q. Before senior vice president of 15 the east region, what was your job 16 title? 17 A. Area vice president, southeast. 18 Q. And was this also in the 19 corrugated division? 20 A. Yes. 21 Q. And during what time frame did 22 you have that title? 23 A. 2014 to 2018. 24 Q. Are you currently in the 25 corrugated division?</p>
<p style="text-align: right;">15</p> <p>1 T. M. SIRACUSA 2 A. Yes. 3 Q. Okay. And what was your next 4 most recent role at WestRock? 5 A. Prior to the area of vice 6 president role? 7 Q. Yes. 8 A. A business unit general manager. 9 Q. And what business unit did you 10 manage? 11 A. Atlanta. 12 Q. I'm sorry, did you say 13 "Atlanta"? 14 A. Yes. 15 Q. Okay. During what time frame 16 were you the business unit general 17 manager for Atlanta? 18 A. 2012 to 2014. 19 Q. And what were your job 20 responsibilities in that role? 21 A. I had responsibility for sales 22 and operations of foreign manufacturing 23 facilities in the Atlanta area. 24 Q. Before you were business unit 25 general manager, what was your title?</p>	<p style="text-align: right;">16</p> <p>1 T. M. SIRACUSA 2 A. General manager. 3 Q. Of what department? 4 A. It was the Norcross 5 manufacturing plant in Norcross, 6 Georgia. 7 Q. During what time period were you 8 general manager of the Norcross 9 facility? 10 A. From 2006 to 2012. 11 Q. And what were your job 12 responsibilities as general manager of 13 Norcross? 14 A. I led sales and operations for 15 the single box plant. 16 Q. Before you were general manager 17 of Norcross -- the Norcross, Georgia 18 facility, what was your job title? 19 A. Director of strategic 20 initiatives. 21 Q. I'm sorry, was that director? 22 A. Yes. 23 Q. Thank you. 24 MS. SLUSARZ: Janice, I keep 25 missing like the very beginning,</p>

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<p>1 T. M. SIRACUSA 2 like the first syllable of each 3 response. I don't know if it's 4 an issue with the audio/visual on 5 your side or if it's an issue 6 with audio on my side. 7 Devora, are you hearing 8 everything? 9 THE STENOGRAPHER: Yes. 10 Q. And I apologize, I know you said 11 "director," but I didn't write down the 12 rest of your title. What was it? 13 A. Strategic initiatives. 14 Q. Strategic initiatives. Okay. 15 And what department did you work 16 for at that time? 17 A. Corrugated. 18 Q. During what time frame were you 19 the director of strategic initiatives? 20 A. 2004 to 2006. 21 Q. And before that, what was your 22 job title? 23 A. General manager. 24 Q. And what were you general 25 manager of?</p>	<p>17</p> <p>1 T. M. SIRACUSA 2 A. The manufacturing facility in 3 Norcross, Georgia. 4 Q. So you were general manager of 5 Norcross, Georgia on two -- for two 6 separate tenures? 7 A. Yes. 8 Q. Okay. During what time frame 9 were you initially general manager of 10 Norcross, Georgia? 11 A. 2001 to 2004. 12 Q. Okay. Before that, what was 13 your title? 14 A. Assistant general manager. 15 Q. Of what facility? 16 A. The Norcross, Georgia plant. 17 Q. And during what time frame were 18 you the assistant general manager? 19 A. 1998 to 2001. 20 MS. SLUSARZ: I'm going to 21 take a -- I'd like to take a 22 quick break. I think I may 23 understand what the sound problem 24 is. I just want to screw with 25 something on my computer. So it</p>
<p>19</p> <p>1 T. M. SIRACUSA 2 should be about two minutes. 3 Maybe one minute. 4 All right. Thanks. We can 5 just go off the record. 6 --- 7 (Whereupon, a recess was 8 taken at this time.) 9 --- 10 Q. Before you were the assistant 11 general manager of the Norcross 12 facility, what was your title? 13 A. Accountant. 14 Q. And during what time frame were 15 you an accountant? 16 A. 1993 to 1998. 17 Q. And was that your first title at 18 WestRock? 19 A. Yes. 20 Q. In your current role as senior 21 vice president of merchandising 22 displays and graphic solutions, what 23 are your job responsibilities? 24 A. I lead sales and operations for 25 manufacturing plants that produce</p>	<p>20</p> <p>1 T. M. SIRACUSA 2 displays and preprint. 3 Q. And is that across 4 United States? I mean, does your job 5 cover the United States or -- 6 A. Yes. 7 Q. -- a different geographic area? 8 A. I have plants in the 9 United States and two in Canada. 10 Q. And how many people report to 11 you directly -- 12 A. Nine. 13 Q. -- in your current role? 14 And what are the titles of the 15 people who report to you? 16 A. Vice president of operations, 17 vice president of sales, senior 18 director of integrated business 19 planning, senior director of creative 20 services, executive assistant. And 21 then I have four graphic business 22 managers. 23 Q. Who is your vice president of 24 sales? 25 A. David Sharp.</p>

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<p>1 T. M. SIRACUSA 2 Q. And what are his 3 responsibilities? 4 A. He leads the salespeople for 5 merchandising displays. 6 Q. And who are the graphics 7 business managers? 8 A. Richard Shue, Patty Metelko, 9 Tony Paterini and Chip Schiffenhaus. 10 Q. What are the job 11 responsibilities of a graphics business 12 manager? 13 A. To maintain and grow graphic 14 packaging -- graphic packaging sales. 15 Q. And how do the graphics business 16 managers affect sales? 17 A. They help grow sales, so 18 increase sales. 19 Q. Okay. What do they do to 20 increase sales? 21 A. They meet with customers and 22 discuss graphic solutions. 23 Q. Are they assigned customers? 24 A. Sometimes. 25 Q. When you are assigned customers,</p>	<p>21 1 T. M. SIRACUSA 2 how is it determined who will get the 3 customer to work on? 4 MS. AGRETTI: Objection. 5 Form. 6 You may answer. 7 A. So some of the graphic business 8 managers work for a particular region, 9 so if it's a customer in that region. 10 Q. Okay. What region does -- does 11 Rick Shue work for a specific region? 12 A. Yes. 13 Q. And what region does he cover? 14 A. The North Atlantic. 15 Q. Does Patty Metelko work for a 16 specific region? 17 A. Yes. 18 Q. And what region is that? 19 A. Southeast. 20 Q. Does Tony Paterini cover a 21 specific region? 22 A. Yes. 23 Q. And what region does he cover? 24 A. The Midwest. 25 Q. And does Chip Schiffenhaus cover</p>
<p>23 1 T. M. SIRACUSA 2 a specific region? 3 A. No -- well, all the 4 United States. 5 Q. Does the corrugated group have 6 sales representatives that bring 7 customers to the graphics business 8 managers? 9 MS. AGRETTI: Objection. 10 Form. 11 You may answer. 12 A. Yes. 13 Q. You mentioned that Chip 14 Schiffenhaus does not have a region. 15 Does he have salespeople who bring 16 business opportunities to him? 17 MS. AGRETTI: Objection. 18 Form. 19 You may answer. 20 A. Can you repeat the question, 21 please? 22 Q. Does Chip Schiffenhaus, 23 specifically, have salespeople who 24 bring business opportunities to him? 25 A. No.</p>	<p>24 1 T. M. SIRACUSA 2 Q. When did Chip Schiffenhaus 3 become a graphic business manager? 4 A. I don't know. 5 Q. Was it within the last three 6 months? 7 MS. AGRETTI: Objection. 8 Form. 9 You may answer. 10 A. No. 11 Q. Well, am I correct that Marshall 12 Krimsky used to be a graphics business 13 manager in your department? 14 A. Yes, he was. 15 Q. And has he been replaced? 16 A. No. 17 Q. Do you have plans to replace 18 him? 19 A. I haven't decided yet. 20 Q. Does Patty Metelko have 21 salespeople who bring business 22 opportunities to her? 23 A. Yes. 24 Q. And are those the salespeople in 25 the Southeast region?</p>

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<p>25</p> <p>1 T. M. SIRACUSA 2 A. Yes. 3 Q. Similarly, Tony Paterini, does 4 he have salespeople who bring business 5 opportunities to him? 6 A. Yes. 7 Q. And I guess those are 8 salespeople in the Midwest region? 9 A. Yes. 10 Q. The salespeople who develop 11 these business opportunities, are they 12 paid on a commission or on a salary or 13 how are they paid? 14 MS. AGRETTI: Objection. 15 Form. 16 You may answer. 17 A. I don't know. 18 Q. Who would know? 19 A. I would assume our HR team or 20 their direct managers. 21 Q. So am I correct that the 22 salespeople are not in your reporting 23 line? 24 A. No, they are not. 25 Q. Are they part of the corrugated</p>	<p>26</p> <p>1 T. M. SIRACUSA 2 division? 3 A. Yes. 4 Q. And who is in charge of the 5 sales reps for the corrugated division? 6 A. There's multiple sales leaders. 7 Q. Okay. Is there one person who 8 is the head of sales? 9 A. Nickie Parker is somewhat in 10 that role. I'm not sure if everyone is 11 reporting up to her. 12 Q. Did you ever prepare a 13 performance evaluation of Mr. Krimsky? 14 A. Yes. 15 Q. And when did you do that? 16 A. Either December 2023 or 17 January 2024. 18 Q. And what was your assessment of 19 Mr. Krimsky's performance? 20 A. I rated him an inconsistent. 21 MS. SLUSARZ: I'd like to 22 mark a document. This is 23 Exhibit 1 and it's Bates stamped 24 KRIMSKY 58 through KRIMSKY 63. 25 - - -</p>
<p>27</p> <p>1 T. M. SIRACUSA 2 (Whereupon, Plaintiff's 3 Exhibit 1, a six-page document, 4 was marked for identification.) 5 - - - 6 MS. SLUSARZ: I've just 7 placed Exhibit 1 in the chat. 8 Janice, are you able to access 9 it? Do you need me to share it? 10 MS. AGRETTI: I am 11 downloading it now. I'll let you 12 know in a minute. 13 MS. SLUSARZ: Okay. 14 MS. AGRETTI: Let me just 15 make a note here for the witness. 16 So there will be documents 17 that will be shared with you 18 today. At the bottom, they 19 either say WestRock and numbers 20 and Krimsky or numbers. What 21 that means is that the party who 22 provided those documents in 23 discovery, that's their stamp. 24 So the documents you are looking 25 at say Krimsky, so Mr. Krimsky</p>	<p>28</p> <p>1 T. M. SIRACUSA 2 provided these documents. 3 If they say WestRock at the 4 bottom, we provided those 5 documents in this litigation. 6 All right. The document is 7 open and I have it here. I'm 8 going to show it to the witness. 9 MS. SLUSARZ: Okay. 10 MS. AGRETTI: Just scroll 11 through the document and look at 12 what you need to look at. 13 She's looking through the 14 document now. 15 MS. SLUSARZ: Sure. 16 A. Okay. 17 Q. Okay. Do you recognize this 18 document? 19 A. Yes. 20 Q. And what is this document? 21 A. It was a performance evaluation 22 for Marshall Krimsky for 2023. 23 Q. Okay. Is this the entire 24 document? 25 A. This would have been just my</p>

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<p>29</p> <p>1 T. M. SIRACUSA 2 manager assessment. There's a 3 self-evaluation that goes with it as 4 well.</p> <p>5 Q. Okay. What was your -- what 6 were your main areas for concern with 7 Mr. Krimsky's performance?</p> <p>8 MS. AGRETTI: Objection. 9 Form.</p> <p>10 You may answer.</p> <p>11 A. The lack of effort to grow new 12 business. The professionalism that he 13 displayed with his customer and with 14 meetings with me. His inability to use 15 company tools such as Outlook, e-mail, 16 calendar. His inability to use the 17 computer in general and use 18 salesforce.com, which is our CRM 19 system.</p> <p>20 Q. Did Mr. Krimsky ever receive 21 training on the company tools and 22 computer systems?</p> <p>23 A. Yes, he did.</p> <p>24 Q. Were you involved at all in the 25 decision to move Mr. Krimsky into the</p>	<p>30</p> <p>1 T. M. SIRACUSA 2 graphics business manager position? 3 A. No.</p> <p>4 Q. Were you aware of Mr. Krimsky's 5 history with the company as being a 6 sales rep rather than -- an outside 7 sales rep?</p> <p>8 A. Yes, I'm aware.</p> <p>9 Q. Okay. So I'm looking at the 10 second to the last page of this 11 document. You talked about 12 Mr. Krimsky's professionalism in 13 meetings. Was the problem that he --</p> <p>14 MS. AGRETTI: One second. 15 We're just trying to get to the 16 portion of the document that you 17 are referring to.</p> <p>18 Are you all looking at 19 page 5, KRIMSKY 62?</p> <p>20 MS. SLUSARZ: It's Bates 21 stamped KRIMSKY 62.</p> <p>22 MS. AGRETTI: Okay.</p> <p>23 MS. SLUSARZ: So yes, I 24 think that is 5.</p> <p>25 MS. AGRETTI: Okay. Okay.</p>
<p>31</p> <p>1 T. M. SIRACUSA 2 It's open.</p> <p>3 Q. What were the issues with 4 Mr. Krimsky's professionalism in 5 meetings?</p> <p>6 MS. AGRETTI: I'm sorry. 7 Hold on. Are you referring to 8 "Marshall needs to improve 9 communication skills to a more 10 professional level"? I just want 11 to make sure we're all on the 12 same page.</p> <p>13 MS. SLUSARZ: Yes.</p> <p>14 MS. AGRETTI: Okay. Okay.</p> <p>15 A. So a few things. One, he would 16 come to meetings unprepared. He would 17 use inappropriate language when having 18 conversations with me.</p> <p>19 Q. Can you give an example of the 20 inappropriate language he's used?</p> <p>21 A. Yes. So I was having a call one 22 time with him and he was talking about 23 the fucking bee that was swirling 24 around his head and -- so I had to 25 listen to a few minutes of him chasing</p>	<p>32</p> <p>1 T. M. SIRACUSA 2 the fucking bee repeatedly.</p> <p>3 Q. And what was your -- actually, 4 let me reword that.</p> <p>5 In the previous page, one of the 6 bullet points is that he has to have 7 more effective communication to the 8 customer. What was your observation 9 concerning his communications with the 10 customer?</p> <p>11 A. So both verbal and written. So 12 from a verbal standpoint, I didn't feel 13 like he was prepared in his 14 communications with customers. And 15 then his verbal communication, his 16 e-mails would be written 17 unprofessionally. So it would be a 18 sentence with an exclamation point, a 19 short sentence with an exclamation 20 point. So I didn't feel like it was 21 very clear and business oriented.</p> <p>22 Q. Mr. Krimsky was fairly effective 23 as a sales representative; am I 24 correct?</p> <p>25 MS. AGRETTI: Objection.</p>

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<p>1 T. M. SIRACUSA 2 Form. 3 You may answer. 4 A. I didn't work with him closely 5 when he was a sales manager -- oh, I'm 6 sorry, a sales representative, so I 7 can't really speak to that. 8 - - - 9 (Begin confidential 10 portion.) 11 - - - 12 Confidential 13 14 15 (End confidential portion.) 16 - - - 17 Q. And is that a -- would you 18 consider that to be a good sales volume 19 for a sales rep? 20 MS. AGRESTI: Objection. 21 Form. 22 You may answer.</p>	<p>33 1 T. M. SIRACUSA 2 A. I would say average. 3 Q. Do you have direct knowledge of 4 the average sales of the sales reps at 5 WestRock? 6 MS. AGRESTI: Objection. 7 Form. 8 You may answer. 9 A. I don't necessarily see that 10 information. 11 Q. Does anyone in your department 12 receive a commission based on their 13 sales? And I mean as opposed to a 14 bonus -- 15 A. Yes. 16 Q. -- I mean a direct commission. 17 MS. AGRESTI: Objection. 18 Form. 19 You may answer. 20 A. Yes. 21 Q. And who receives commissions in 22 your department? 23 A. So none of my direct reports, 24 but sales reps who sell for 25 merchandising displays receive</p>
<p>1 T. M. SIRACUSA 2 commission. 3 Q. Okay. So there are sales reps 4 in your reporting line? 5 A. Yes. 6 Q. And whom do they report to? 7 A. David Sharp. They report to 8 managers who report to David Sharp. 9 Q. Okay. To your knowledge, did 10 anyone in your reporting line receive a 11 commission for sales to Pepperidge 12 Farms? 13 MS. AGRESTI: Objection. 14 Form. 15 You may answer. 16 A. No. 17 MS. SLUSARZ: I'd like to 18 mark another document. 19 Okay. This is Exhibit 20 No. 2, which is Bates stamped 21 KRIMSKY 39. 22 - - - 23 (Whereupon, Plaintiff's 24 Exhibit 2, a document, was marked 25 for identification.)</p>	<p>35 1 T. M. SIRACUSA 2 - - - 3 MS. AGRESTI: Downloading it 4 now. 5 MS. SLUSARZ: Yeah. 6 Q. Please take a look at this 7 document. 8 MS. AGRESTI: Okay. The 9 document is open. 10 MS. SLUSARZ: Okay. 11 MS. AGRESTI: Feel free to 12 scroll through it, if you need 13 to. 14 THE WITNESS: Okay. 15 MS. AGRESTI: We just 16 reviewed the document. 17 Q. Okay. Ms. Siracusa, have you 18 seen this form of a document before? 19 A. No. 20 Q. Okay. And you haven't seen this 21 specific document before either? 22 A. Never. 23 Q. Okay. And just to confirm, you 24 are not aware of anyone receiving a two 25 percent commission -- I'm sorry, who</p>

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<p>1 T. M. SIRACUSA 2 received a two percent commission on 3 Pepperidge Farm sales; is that correct? 4 A. That's correct. 5 Q. Okay. Going back to Exhibit 1. 6 Do you have it up? 7 MS. AGRESTI: Yes, it's up. 8 Q. Okay. I'm looking at the second 9 page, which is Bates stamped KRIMSKY 10 59, and the bullet point there starts, 11 "As the representative for Pepperidge 12 Farms, a key account plan and quarterly 13 business reviews organized by Marshall 14 with the customer and WestRock team 15 would have been beneficial in 16 identifying service gaps and 17 strengthening the relationship with the 18 customer. Neither of these have been 19 completed for Pepperidge Farms." 20 Do you see this? Do you see 21 where it says that? 22 A. Yes. 23 Q. How would a key account plan and 24 quarterly business review have helped 25 identify service gaps with Pepperidge</p>	<p>37</p> <p>1 T. M. SIRACUSA 2 Farm? 3 A. So to start, a key account plan 4 is an overview of the account in 5 general. So it has key contacts, who 6 is responsible for what, potential 7 opportunities within the account, level 8 of relationships with different people. 9 So we would typically set that up for 10 all our key accounts so that that is a 11 record that we store in salesforce.com. 12 And then a quarterly business review is 13 an organized meeting that we have with 14 large customers each quarter and there 15 is a specific agenda to that. 16 So you would go over, you know, 17 business forecasts with the customer, 18 how plans are performing, whether it's 19 on-time delivery or any quality issues. 20 You would talk about potential 21 opportunities to work with the 22 customer, sustainability, continuous 23 improvement efforts with them. It's a 24 standard process that we do with large 25 accounts.</p>
<p>39</p> <p>1 T. M. SIRACUSA 2 Q. Okay. So Pepperidge Farm is a 3 large account? 4 A. Yes. 5 Q. Just earlier you described 6 Mr. Krimsky's sales to Pepperidge Farm 7 as -- I don't know if I have it down, 8 but it seemed like you thought it was, 9 you know, adequate -- average was the 10 word you used. 11 MS. AGRESTI: Objection. 12 Form. Objection. Form. 13 Q. Okay. Were key account plans 14 always used in the global -- sorry, 15 merchandising display and graphic 16 solutions department? 17 A. It's a common practice in our 18 company. 19 Q. Do you know if they were used in 20 the merchandising display and graphic 21 solution department before you became 22 the senior vice president? 23 A. Yes, they were. 24 Q. Did Mr. Krimsky meet his budget 25 for sales to Pepperidge Farms in 2023?</p>	<p>40</p> <p>1 T. M. SIRACUSA 2 A. Yes. 3 --- 4 (Begin confidential 5 portion.) 6 --- 7 Confidential 8 --- 9 (Begin confidential portion.) 10 --- 11 Q. Did Mr. Krimsky have sales 12 representatives who reported 13 opportunities up to him? 14 A. Not that I am aware of. 15 Q. Okay. So he didn't cover a 16 specific geographic area? 17 A. No. 18 Q. Were the graphic business 19 managers who covered a specific area, 20 were they expected to go out and 21 develop their own sales leads? 22 A. That's part of what they do.</p>

10 (Pages 37 to 40)

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<p>1 T. M. SIRACUSA</p> <p>2 Q. Is that a measurable -- is that</p> <p>3 a measured part of their performance</p> <p>4 evaluation, developing sales leads</p> <p>5 independently?</p> <p>6 A. Not specifically, but new</p> <p>7 business would be part of their</p> <p>8 incentive plan.</p> <p>9 Q. But for the graphics business</p> <p>10 managers who represented -- who covered</p> <p>11 a specific territory, new business also</p> <p>12 included new sales leads from the sales</p> <p>13 representatives, correct?</p> <p>14 A. Yes.</p> <p>15 MS. AGRESTI: Objection.</p> <p>16 Form.</p> <p>17 You may answer.</p> <p>18 A. Yes.</p> <p>19 Q. How are quality issues handled,</p> <p>20 you know, customer quality issues</p> <p>21 handled at WestRock?</p> <p>22 A. So typically, a quality issue</p> <p>23 would be communicated to either a sales</p> <p>24 representative or sometimes customer</p> <p>25 service, and then they were logged into</p>	<p>1 T. M. SIRACUSA</p> <p>2 a customer complaint system.</p> <p>3 Q. Could a sales rep call a factory</p> <p>4 and say -- and, you know, stop</p> <p>5 production if there were quality issues</p> <p>6 from that --</p> <p>7 MS. AGRESTI: You went out a</p> <p>8 little bit and then you came</p> <p>9 back --</p> <p>10 MS. SLUSARZ: That's okay.</p> <p>11 It was a painful question anyway.</p> <p>12 MS. AGRESTI: The audio went</p> <p>13 out and in, so we didn't hear the</p> <p>14 whole question.</p> <p>15 MS. SLUSARZ: Just as well.</p> <p>16 Q. If a graphics -- well, do</p> <p>17 graphics business managers visit the</p> <p>18 production sites?</p> <p>19 A. Sometimes, yes.</p> <p>20 Q. Okay. And if they saw a quality</p> <p>21 issue, were they able to, you know,</p> <p>22 stop production right away to have that</p> <p>23 addressed?</p> <p>24 A. They wouldn't necessarily stop</p> <p>25 production because that item might not</p>
<p>1 T. M. SIRACUSA</p> <p>2 be running in our facility. Your</p> <p>3 question is not very clear or maybe</p> <p>4 relevant to what we do.</p> <p>5 Q. Are you aware that there were</p> <p>6 quality issues that -- well, there were</p> <p>7 massive quality issues concerning the</p> <p>8 Pepperidge Farms products that were</p> <p>9 being produced?</p> <p>10 A. Yes.</p> <p>11 MS. AGRESTI: Objection.</p> <p>12 Form.</p> <p>13 You may answer.</p> <p>14 A. Yes.</p> <p>15 Q. And what were the problems?</p> <p>16 A. A majority of our problems were</p> <p>17 with warp.</p> <p>18 Q. Were there any other problems?</p> <p>19 A. I don't know the specifics of</p> <p>20 other problems, if there were more.</p> <p>21 Q. Okay. And the warping, that</p> <p>22 made it impossible to use the products</p> <p>23 in Pepperidge Farm's machines; is that</p> <p>24 correct?</p> <p>25 MS. AGRESTI: Objection.</p>	<p>1 T. M. SIRACUSA</p> <p>2 Form.</p> <p>3 You may answer.</p> <p>4 A. Not impossible, but difficult.</p> <p>5 Q. How long was Pepperidge --</p> <p>6 sorry, strike that.</p> <p>7 How long was WestRock aware of</p> <p>8 the warping issues with Pepperidge Farm</p> <p>9 products?</p> <p>10 A. So I became aware in March of</p> <p>11 last year when Marshall started</p> <p>12 reporting to me. I'm not -- I don't</p> <p>13 know prior to that how long they were</p> <p>14 aware.</p> <p>15 MS. SLUSARZ: Okay. I'd</p> <p>16 like to take a ten-minute break</p> <p>17 at this time. So if we could</p> <p>18 reconvene at 10:40.</p> <p>19 MS. AGRESTI: Okay.</p> <p>20 MS. SLUSARZ: Thanks.</p> <p>21 - - -</p> <p>22 (Whereupon, a recess was</p> <p>23 taken at this time.)</p> <p>24 - - -</p> <p>25 MS. AGRESTI: Could you read</p>

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<p>1 T. M. SIRACUSA 2 back my last question, please. 3 --- 4 (Whereupon, the referred-to 5 question was read back by the 6 stenographer.) 7 --- 8 Q. Okay. So in March 2023, you 9 became aware of the warping issue. Was 10 it ever resolved? 11 MS. AGRESTI: Objection. 12 Form. 13 You may answer. 14 A. So the warping issue at the time 15 at the Willard facility, we lost the 16 business. 17 Q. How would having more meetings 18 with Pepperidge Farm have resolved the 19 warping issue with the Willard 20 facility? 21 A. So typically what would happen 22 is the account manager would be 23 visiting the facility regularly, like 24 Pepperidge Farms facility regularly, to 25 understand and watch and see some of</p>	<p>45</p> <p>1 T. M. SIRACUSA 2 the issues. And then their 3 responsibility would be to communicate 4 that back to the operations facility. 5 And then they would work together on a 6 corrective action. 7 Q. Do you know if Mr. Krimsky made 8 visits to Pepperidge Farms 9 headquarters? 10 A. He would tell me that he went to 11 Pepperidge Farms headquarters, but not 12 the manufacturing facilities. 13 Q. Do you think he received 14 different information because he went 15 to headquarters instead of the 16 manufacturing facility? 17 MS. AGRESTI: Objection. 18 Form. 19 You may answer. 20 A. I don't know. 21 Q. When did you first begin to 22 consider terminating Mr. Krimsky's 23 employment? 24 A. Last summer. 25 Q. Was there anything in particular</p>
<p>1 T. M. SIRACUSA 2 that led you to begin considering 3 termination? 4 A. So one, we had been notified of 5 the loss of Pepperidge Farms. And I 6 had been talking to Marshall about 7 growing new business and he had shown 8 no activity around growing any new 9 business. And again, to what I said 10 previously, his unprofessionalism and 11 dealing with the customer as well as -- 12 as me and in other meetings, I did not 13 see the ability for him to continue to 14 grow with WestRock. 15 Q. What was the lack of 16 professionalism with his customers, 17 what did that entail? 18 A. Not coming to a meeting 19 prepared. We had a meeting with the 20 Pepperidge Farm main buyer and Marshall 21 didn't even know the plant manager's 22 name at Willard. So he just didn't 23 have an attention to detail or come 24 prepared to those meetings. 25 Q. Approximately how old is Rick</p>	<p>47</p> <p>1 T. M. SIRACUSA 2 Shue? 3 MS. AGRESTI: Objection. 4 Form. 5 A. I don't know. 6 Q. Do you believe he's in his 30s? 7 MS. AGRESTI: Objection. 8 Form. 9 You may answer. 10 A. I would say no. 11 Q. His 40s? 12 A. Maybe. 13 Q. And what about Patty Metelko, 14 approximately how old is she? 15 MS. AGRESTI: Objection. 16 Form. 17 You may answer. 18 A. Maybe in her 50s. 19 Q. And Tony Paterini, approximately 20 how old is he, do you think? 21 MS. AGRESTI: Objection. 22 Form. 23 You may answer. 24 A. Maybe 50s or 60s. 25 Q. And Chip Schiffenhaus,</p>

12 (Pages 45 to 48)

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<p style="text-align: right;">49</p> <p>1 T. M. SIRACUSA 2 approximately how old do you think he 3 is? 4 MS. AGRETTI: Objection. 5 Form. 6 You may answer. 7 A. 60s, maybe older, maybe 70s. 8 Q. And how old do you believe 9 Mr. Krimsky is? 10 MS. AGRETTI: Objection. 11 Form. 12 You may answer. 13 A. I don't know how old he is. I'd 14 say maybe in his 60s. 15 Q. Did you ever comment to 16 Mr. Krimsky about his age? 17 A. No. 18 Q. Are you aware of anyone else 19 making comments about Mr. Krimsky's 20 age? 21 A. I'm not aware of that. 22 Q. Are you aware of anyone asking 23 Mr. Krimsky when he's going to retire? 24 A. I'm not aware of that. 25 Q. Are you aware that Mr. Krimsky</p>	<p style="text-align: right;">50</p> <p>1 T. M. SIRACUSA 2 had pancreatic cancer? 3 A. I'm not aware of that. 4 MS. SLUSARZ: I'm going to 5 mark another document. And this 6 is -- just give me a second. 7 Okay. It's KRIMSKY 32. 8 Exhibit 3. 9 --- 10 (Whereupon, Plaintiff's 11 Exhibit 3, a spreadsheet, was 12 marked for identification.) 13 --- 14 MS. SLUSARZ: Give me a 15 second. 16 All right. I have dropped it in the chat. 17 MS. AGRETTI: We're 18 downloading the document. 19 MS. SLUSARZ: Sure. 20 MS. AGRETTI: Feel free to 21 scroll. 22 Q. Do you have the document up? 23 A. Yes. 24 Q. Okay. So before we turn to</p>
<p style="text-align: right;">51</p> <p>1 T. M. SIRACUSA 2 this, am I correct that both Rick Shue 3 and Mr. Krimsky worked on the 4 Pepperidge Farm account? 5 A. Yes. 6 Q. And how was responsibility for 7 Pepperidge Farm divided between them? 8 A. You mean as far as the financial 9 side or process? I'm not clear on your 10 question. 11 Q. Okay. Well, did they -- who 12 performed what tasks concerning 13 Pepperidge Farm account? 14 A. So Rick Shue would enter any 15 quote requests, he would manage the 16 preprint forecast and give that 17 information to the preprint team. I 18 don't know what he did beyond that. 19 Q. Okay. And from a financial 20 perspective, how was Pepperidge Farm 21 divided between the two of them? 22 A. I don't know honestly. I don't 23 know exactly. 24 Q. Did Mr. Shue have monthly 25 meetings with Pepperidge Farm?</p>	<p style="text-align: right;">52</p> <p>1 T. M. SIRACUSA 2 A. I know he had regular meetings 3 with someone at Pepperidge Farms to 4 review forecasts. 5 Q. Okay. Did he do quarterly 6 business reviews with Pepperidge Farm? 7 A. I'm not aware that he did those. 8 Q. Okay. Was he at all responsible 9 for the quality issues in the Willard 10 facility -- 11 A. No. 12 Q. -- where Pepperidge Farm is 13 concerned? 14 A. No. 15 Q. All right. Let's take a look at 16 Exhibit 3. Have you seen this document 17 before? 18 A. Yes. 19 Q. And what is this document? It's 20 a spreadsheet. What is this 21 spreadsheet telling us? 22 A. It tracks actual sales compared 23 to budget and where that is from an incentive payout -- an annual incentive payout.</p>

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<p style="text-align: right;">53</p> <p>1 T. M. SIRACUSA 2 Q. Okay. And as of -- I mean this 3 doesn't have information in the final 4 column for -- I mean it has some 5 information, but not a monetary 6 information for the actual Pepperidge 7 Farm sales in September 2023. But does 8 this show that Mr. Krimsky exceeded the 9 budget for Pepperidge Farm sales in the 10 2023 fiscal year? 11 MS. AGRETTI: Objection. 12 Form. 13 You may answer. 14 A. So it does not show that he 15 exceeded the budget for the preprint 16 rolls. It does show that he exceeded 17 budget for Pepperidge on the litho 18 packaging. 19 Q. Okay. Do you know if by the end 20 of the year he met the budget for the 21 preprint rolls? 22 A. I don't recall off the top of my 23 head. I would have to look at the 24 report for September. 25 Q. Well, looking down at</p>	<p style="text-align: right;">54</p> <p>1 T. M. SIRACUSA 2 lithography, am I correct that the 3 total amount budgeted -- the total 4 sales budgeted for Mr. Krimsky was 5 2,525,000? 6 A. Yes. 7 Q. And that his actual sales for 11 8 of the 12 months of the fiscal year was 9 7,615,000? 10 A. Yes. 11 Q. So while he didn't generate the 12 new business that was expected, he 13 developed -- he generated more than was 14 budgeted for his total lithography 15 sales, correct? 16 MS. AGRETTI: Objection. 17 Form. 18 You may answer. 19 A. Yes. But he did not develop new 20 business, which was part of his goals. 21 Q. Are you aware that as a 22 commission salesperson, Mr. Krimsky 23 regularly earned greater than \$500,000 24 a year? 25 MS. AGRETTI: Objection.</p>
<p style="text-align: right;">55</p> <p>1 T. M. SIRACUSA 2 Form. 3 You may answer. 4 A. I -- Marshall did not report to 5 me when he was at that level. 6 Q. Okay. I'm just asking if you 7 are aware of that fact? 8 A. I was aware, yes. 9 Q. Okay. And am I correct that 10 with the change over to being a 11 graphics business manager, the most he 12 could hope to receive -- the most he 13 could hope to earn was 145,000 in 14 salary and \$58,000 in a target bonus? 15 MS. AGRETTI: Objection. 16 Form. 17 You may answer. 18 A. Yes, that's correct. 19 Q. Okay. So with the job change, 20 his income decreased by at least 21 \$300,000 -- 22 MS. AGRETTI: Objection. 23 Form. 24 Q. -- per year? 25 MS. AGRETTI: Objection.</p>	<p style="text-align: right;">56</p> <p>1 T. M. SIRACUSA 2 Form. 3 You may answer. 4 A. I have not seen those numbers. 5 Q. Okay. But based on your -- 6 sorry. Never mind. 7 Who is David Steel? 8 A. He used to work for Smurfit 9 Westrock. 10 Q. Okay. And what was his job 11 responsibilities? 12 A. The graphic business managers 13 reported to him. 14 Q. Okay. The graphics business 15 managers report directly to you now, 16 correct? 17 A. Yes. 18 Q. Okay. When did Mr. Steel leave 19 WestRock? 20 A. March of 2023. 21 Q. And why did he leave? 22 A. His position was eliminated. 23 Q. Why was it eliminated? 24 A. We had an SG&A reduction 25 companywide, and when I looked at the</p>

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<p style="text-align: right;">57</p> <p>1 T. M. SIRACUSA 2 positions that I had, I didn't feel 3 that it was adding value. 4 Q. What does SG&A reduction mean? 5 A. We reduce the number of people 6 that we have working for the company. 7 Q. Okay. Was it -- does -- do the 8 initials SG&A stand for something? 9 A. Selling, general and 10 administration. 11 MS. SLUSARZ: I'd like to 12 mark a document. I guess we're 13 up to Exhibit 4. 14 --- 15 (Whereupon, Plaintiff's 16 Exhibit 4, a three-page document, 17 was marked for identification.) 18 --- 19 Q. Please take a look at what's 20 been marked as Exhibit 4. It is Bates 21 stamped KRIMSKY 52 through 54. 22 MS. AGRESTI: We just got 23 the document in the chat. I'm 24 downloading it now. 25 The document is in front of</p>	<p style="text-align: right;">58</p> <p>1 T. M. SIRACUSA 2 her, but she's going to look 3 through it first. 4 MS. SLUSARZ: Sure. 5 MS. AGRESTI: Feel free to 6 zoom in here. 7 A. Okay. I've reviewed. 8 Q. Okay. Have you seen this 9 document before? 10 A. No. 11 Q. Okay. So you don't know who 12 prepared it or the circumstances of 13 this? 14 A. I don't know who prepared it. 15 Q. Okay. Do you know what it is? 16 A. It looks like a document on how 17 the process for handling customer 18 issues at Pepperidge Farms in Denver, 19 Pennsylvania. 20 Q. Okay. 21 MS. AGRESTI: I just note 22 for the record that the witness 23 has testified she's never seen 24 this document before, so to the 25 extent that she is explaining</p>
<p style="text-align: right;">59</p> <p>1 T. M. SIRACUSA 2 what it is, it would only be 3 based on what is presented to her 4 on face value for this document 5 as she has no personal knowledge 6 of this document. 7 MS. SLUSARZ: Understood. 8 I'm going to mark another 9 exhibit. Exhibit 5, which is 10 Bates stamped KRIMSKY 101 through 11 109 -- sorry, 110. 12 --- 13 (Whereupon, Plaintiff's 14 Exhibit 5, a ten-page document, 15 was marked for identification.) 16 --- 17 MS. SLUSARZ: Okay. It is 18 in the chat now. 19 MS. AGRESTI: We're 20 downloading it now. 21 All right. It's ten pages' 22 worth of documents, so just give 23 us a few minutes. She'll go 24 through the document now. 25 MS. SLUSARZ: Okay.</p>	<p style="text-align: right;">60</p> <p>1 T. M. SIRACUSA 2 A. Okay. I've reviewed. 3 Q. Okay. Turning to the second to 4 the last page, it's page 8, Bates 5 stamped KRIMSKY 108. It says, "On 6 Monday, 10/30, Chris, Lisa and myself 7 visited the Pepperidge Farm Denver, PA 8 facility. We met with the Pepperidge 9 Farm team, Matt, Patrick and Bronwyn. 10 Bronwyn will be phasing out of the 11 quality roll and Patrick will be taking 12 over." 13 Do you see that? 14 A. Yes. 15 Q. Okay. So Rick Shue did visit 16 the Pepperidge Farm manufacturing 17 facilities, correct? 18 MS. AGRESTI: Objection. 19 Form. 20 You may answer. 21 A. He did. 22 Q. Okay. Who is Davin Carr? 23 A. He's the quality manager. 24 Q. Okay. Is he in your reporting 25 line?</p>

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<p>1 T. M. SIRACUSA 2 A. Yes. 3 MS. AGRETTI: Objection as 4 to the term "reporting line." 5 But you may answer. 6 A. Yes, he's in my reporting line. 7 Q. Okay. Who is Jessica 8 Mastronicola? 9 A. I don't know exactly what her 10 role is. 11 Q. Okay. Do you know who Chris 12 Schroll is? 13 A. I do not know who -- I do not 14 know what his role is. I've heard the 15 name. 16 Q. What about Lisa Shuey? 17 A. Yeah, she is an account manager 18 in my reporting line. 19 Q. Is an account manager different 20 from a graphics business manager? 21 A. Yes. 22 Q. What do account managers do? 23 A. More of a support role. So they 24 support salespeople or accounts in 25 doing some of, you know, administrative</p>	<p>61</p> <p>1 T. M. SIRACUSA 2 work, work on different projects. 3 Q. And did she report to you or did 4 she report to someone else? 5 A. She reports to someone else. 6 Q. Okay. To whom does she report? 7 A. I don't know exactly. 8 Q. Okay. And who is Tom Rossi? 9 A. He's vice president of 10 operations. 11 Q. Does he report to you? 12 A. Yes. 13 Q. If you notice in the third 14 paragraph, it says, "The main topic of 15 discussion was about the NC's." 16 Do you know what NC stands for? 17 A. Nonconformance. 18 Q. Okay. So those are quality 19 issues? 20 A. Yes. 21 Q. How did the -- well, based on 22 this document, how well did the meeting 23 at the Denver, Pennsylvania facility 24 go? 25 MS. AGRETTI: Objection.</p>
<p>63</p> <p>1 T. M. SIRACUSA 2 Form. 3 You may answer. 4 A. So I was not there, but I heard 5 that the meeting went well, that we 6 helped them identify issues. 7 Q. What were the issues we helped 8 -- you helped them to identify? 9 MS. AGRETTI: Objection. 10 Form. 11 You may answer. 12 A. So I wasn't there, but what was 13 identified were reasons for warp or 14 reasons why they were having that 15 problem. 16 Q. Okay. At the very beginning of 17 the document, there's an e-mail from 18 David Sharp to Marshall Krimsky, Rich 19 Shue, Davin Carr and Tom Rossi -- 20 MS. AGRETTI: Hold on. When 21 you say the beginning of the 22 document, do you mean 23 chronologically or do you mean 24 the top of the -- like page 1 of 25 the document?</p>	<p>64</p> <p>1 T. M. SIRACUSA 2 MS. SLUSARZ: Page 1. 3 MS. AGRETTI: All right. 4 Hold on. She's getting there. 5 Okay. Is it the bottom of 6 page 1? 7 MS. SLUSARZ: Yes. 8 MS. AGRETTI: You said an 9 e-mail from David Sharp? Is that 10 the one, December 18, 2023, 8:12 11 p.m. 12 MS. SLUSARZ: Yes. 13 MS. AGRETTI: Okay. We're 14 there now. 15 Q. Okay. It says, "Marshall, we 16 can certainly have QA add your name to 17 the file they are currently updating." 18 Do you know what file he's 19 referring to? 20 A. I do not. I do not. 21 Q. Okay. Is there any reason why 22 Mr. Krimsky's name would not be 23 included on a file that relates to the 24 Pepperidge Farm business? 25 MS. AGRETTI: Objection.</p>

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<p>1 T. M. SIRACUSA 2 Form. 3 You may answer. 4 A. I don't know specifically why 5 they didn't put his name on that 6 report, but he usually wasn't very 7 responsive on those issues, so I would 8 assume that they excluded him for that, 9 but I don't know the exact reason. 10 Q. You testified earlier that 11 WestRock lost the business in the 12 Willard facility. I believe that's 13 what you said; was that -- am I 14 correct? 15 A. That's correct. 16 Q. And what was the business in the 17 Willard facility? 18 A. It was a packaging business. 19 Q. Okay. Was it any specific 20 packaging for Pepperidge Farm? 21 A. I don't know specifically what 22 product they made at Willard. 23 Q. Did WestRock make products for 24 Pepperidge Farm in other facilities? 25 A. Yes -- wait, repeat that</p>	<p>65</p> <p>1 T. M. SIRACUSA 2 question. 3 Q. Did WestRock make products for 4 Pepperidge Farm in facilities other 5 than Willard? 6 A. For Pepperidge Farms? 7 Q. Yeah. 8 A. Yes. 9 Q. Does Pepperidge Farm currently 10 do business with WestRock? 11 A. Yes. 12 Q. And to the extent you know, what 13 are their sales to date from the end of 14 the last fiscal year to date? 15 --- 16 (Begin confidential 17 portion.) 18 --- 19 Confidential 20 --- 21 (End confidential portion.) 22 --- 23 MS. AGRESTI: I'll just ask</p>
<p>67</p> <p>1 T. M. SIRACUSA 2 that those numbers be marked 3 confidential. Further, I believe 4 earlier there was testimony about 5 approximate numbers as well 6 related to Pepperidge Farm, and 7 we ask that any client financials 8 be marked confidential in the 9 file throughout. 10 MS. SLUSARZ: I have no 11 objection. 12 MS. AGRESTI: Thank you. 13 Q. And just so we're clear, the 14 fiscal year began on October 1, 2023, 15 correct? 16 A. Yes. 17 Q. Do you believe that Mr. Krimsky 18 was well-suited for the position of 19 graphics business manager? 20 MS. AGRESTI: Objection. 21 Form. 22 You may answer. 23 A. No. 24 Q. And why not? 25 A. Again, I go back to what I have</p>	<p>68</p> <p>1 T. M. SIRACUSA 2 said in the past, just his willingness 3 and ability to grow the business, learn 4 salesforce.com, learn WestRock's tools 5 to be able to sell, his use of 6 technology and how he communicates with 7 customers, I didn't feel was aligned 8 with how we do business. 9 Q. Was he a bit of a dinosaur? 10 MS. AGRESTI: Objection. 11 Form. What do you mean by that, 12 Counsel? 13 MS. SLUSARZ: It's a 14 metaphor. 15 MS. AGRESTI: No. No. 16 That's not an answer. So we're 17 not answering that. We need that 18 to be -- what does a metaphor 19 mean? 20 MS. SLUSARZ: No, no. A 21 metaphor. A dinosaur is a 22 metaphor. 23 MS. AGRESTI: Objection to 24 form. 25 You may answer.</p>

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<p>69</p> <p>1 T. M. SIRACUSA 2 A. I'm not clear on that question. 3 Q. Well, do you believe that 4 Mr. Krimsky was too old to learn the 5 technology needed to be a successful 6 graphics business manager? 7 A. No. 8 Q. What were the reasons you placed 9 Mr. Krimsky on a performance 10 improvement plan? 11 A. Because he didn't show the 12 willingness or the ability to do the 13 role. 14 Q. Okay. And was Rick Shue placed 15 on any performance improvement plan for 16 the loss of the Pepperidge Farm 17 business? 18 MS. AGRESTI: Objection. 19 Form. 20 You may answer. 21 A. No. 22 Q. Did he receive any kind of 23 discipline for the loss of the 24 Pepperidge Farm business? 25 MS. AGRESTI: Objection.</p>	<p>70</p> <p>1 T. M. SIRACUSA 2 Form. 3 You may answer. 4 A. No. But neither did Marshall. 5 Q. Okay. Did he suffer any, you 6 know, adverse ramifications for the 7 loss of the Pepperidge Farm business? 8 MS. AGRESTI: Objection. To 9 the extent that that's calling 10 for a legal conclusion, she will 11 not answer. I don't know if you 12 want to rephrase. 13 Q. Did he suffer any harm from 14 the -- sorry. 15 Did Mr. Shue suffer any harm 16 from the loss of the Pepperidge Farm 17 business? 18 MS. AGRESTI: Objection. 19 Form. 20 You may answer. 21 A. It would have impacted his 22 financial incentive. 23 MS. SLUSARZ: Okay. I'd 24 like to mark a document. And 25 this is Exhibit 6 --</p>
<p>71</p> <p>1 T. M. SIRACUSA 2 MS. AGRESTI: Can we just 3 take a five-minute break -- 4 MS. SLUSARZ: Sure. 5 MS. AGRESTI: -- I just need 6 to use the ladies' room. 7 Okay. 8 MS. SLUSARZ: Absolutely. 9 MS. AGRESTI: Thank you. 10 MS. SLUSARZ: Let's just 11 reconvene at 11:30. 12 MS. AGRESTI: Okay. Sounds 13 good. Thank you. 14 --- 15 (Whereupon, a recess was 16 taken at this time.) 17 --- 18 MS. SLUSARZ: I'll mark it 19 Exhibit 6. 20 --- 21 (Whereupon, Plaintiff's 22 Exhibit 6, a three-page document, 23 was marked for identification.) 24 --- 25 Q. Okay. So Exhibit 6, I just</p>	<p>72</p> <p>1 T. M. SIRACUSA 2 placed in the chat. It is Bates 3 stamped KRIMSKY 55 through KRIMSKY 57. 4 MS. AGRESTI: We're 5 downloading it now. 6 Feel free to scroll through 7 it and then just let them know 8 when you are ready. 9 A. Okay. I've reviewed. 10 Q. Okay. Have you seen this 11 document before? 12 A. Yes. 13 Q. And what is this document? 14 A. It's a performance improvement 15 plan that was presented to Marshall. 16 Q. And did you present this to him 17 on or about January 15, 2024? 18 A. Yes. 19 Q. What were the -- what are the 20 actions that Mr. Krimsky was required 21 to take under this performance 22 improvement plan? 23 A. So he had to complete a key 24 account plan for Campbell's. He had to 25 achieve sales --</p>

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<p>73</p> <p>1 T. M. SIRACUSA 2 Q. Sorry. I was just going to say 3 Campbell's is the parent company for 4 Pepperidge Farm, correct? 5 A. Yes. 6 Q. Okay. I'm sorry. Would you 7 please continue. 8 A. Achieve sales revenue of at 9 least \$10 million in fiscal year '24 by 10 qualified three new accounts to 11 generate sales for WestRock. Also, he 12 had to submit a detailed written plan 13 to achieve the \$10 million. He had to 14 coordinate a monthly meeting with the 15 operations team to review the 16 Campbell's account. And so have a 17 regular cadence to review new items, 18 forecast, quality issues. Create an 19 agenda for that meeting and set that 20 meeting up via Teams. 21 He had to complete training for 22 Microsoft Outlook and Teams. So the 23 ability to use -- utilize Outlook and 24 utilize Teams for meetings and 25 presentations. He had to complete</p>	<p>74</p> <p>1 T. M. SIRACUSA 2 Salesforce training so that he could 3 enter new opportunities and information 4 into Salesforce. And then maintain an 5 active pipeline in Salesforce. 6 Q. Were these action items feasible 7 in a 60-day period? 8 MS. AGRESTI: Objection. 9 Form. 10 You may answer. 11 A. Absolutely, yes. 12 Q. Okay. What about achieving 13 \$10 million in sales for the remainder 14 of fiscal year 2024 -- 15 MS. AGRESTI: Objection. 16 Form. 17 You may answer. 18 Q. -- was that feasible? 19 MS. AGRESTI: Objection. 20 Form. 21 You may answer. 22 A. Yes. 23 Q. And how was Mr. Krimsky expected 24 to go out and generate this \$10 million 25 in sales?</p>
<p>75</p> <p>1 T. M. SIRACUSA 2 MS. AGRESTI: Objection. 3 Form. 4 You may answer. 5 A. So that would start -- he would 6 prospect new accounts. He would reach 7 out to those new accounts and use his 8 sales ability to sell new accounts. 9 Q. Were you planning to terminate 10 Mr. Krimsky's employment when you 11 issued this performance improvement 12 plan to him? 13 A. No, not if he could meet the 14 requirements of the performance 15 improvement plan. 16 Q. But had you had any discussions 17 with anyone about the possibility of 18 terminating Mr. Krimsky's employment by 19 the time you issued this performance 20 improvement plan? 21 A. I had conversations with our 22 legal counsel. 23 Q. Anyone else? 24 MS. AGRESTI: I'm sorry. I 25 just want to get something on the</p>	<p>76</p> <p>1 T. M. SIRACUSA 2 record. I think previously you 3 asked about if \$10 million sales 4 is feasible in a 60-day period. 5 I think that's a 6 misrepresentation of the document 7 here. It says that in a 60-day 8 period -- 9 MS. SLUSARZ: Well -- 10 MS. AGRESTI: -- a 60-day 11 period and there was a March 1st 12 deadline for a task, but that was 13 not necessarily what was -- how 14 the question was framed. It was 15 framed as if it was \$10 million 16 in sales in a 60-day period. 17 MS. SLUSARZ: Are you 18 testifying, Counselor? 19 MS. AGRESTI: No, I'm 20 basically correcting what you 21 testified, which was, again, 22 inaccurate. 23 MS. SLUSARZ: No, you are 24 correcting a question that was 25 answered and trying to testify as</p>

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<p>1 T. M. SIRACUSA 2 to what the question was asking. 3 I mean, my question either made 4 sense or it didn't. I'm not too 5 worried about it. 6 MS. AGRESCI: I understand 7 you are not too worried about it, 8 but I needed to clarify that the 9 question that you asked was not 10 based on what the document said. 11 MS. SLUSARZ: So you're 12 interpreting the document? 13 MS. AGRESCI: No, you were. 14 MS. SLUSARZ: Anyway. 15 Q. Did you have conversations with 16 anyone other than legal concerning the 17 termination of Mr. Krimsky's 18 employment? 19 A. The HR manager. 20 Q. And who is the HR manager? 21 A. Carrie Robards. 22 Q. What did you discuss with 23 Ms. Robards? 24 A. Marshall's deficiencies and how 25 he was not meeting the requirements of</p>	<p>77</p> <p>1 T. M. SIRACUSA 2 the role. 3 Q. When did you first have 4 discussions with Ms. Robards about 5 terminating Mr. Krimsky's employment? 6 MS. AGRESCI: Objection. 7 Form. 8 You may answer. 9 A. I don't recall exactly. 10 Q. Was it in -- do you recall if it 11 was in 2023? 12 A. Yes, it would have been, because 13 I rated him inconsistent on his 14 performance review, so I would have had 15 those conversations with her. 16 Q. And did Ms. Robards have any 17 suggestions for you about how to 18 proceed? 19 A. No. 20 Q. Did she say anything to you in 21 your discussions about terminating 22 Mr. Krimsky's employment? 23 A. She just guided me to document 24 on his performance review. 25 Q. Did you have any discussion with</p>
<p>1 T. M. SIRACUSA 2 Ms. Robards about the performance 3 improvement plan that's Exhibit 6? 4 A. Yes. 5 Q. And what are the nature of those 6 discussions? 7 MS. AGRESCI: Objection. 8 To the extent that any of 9 those conversations were had with 10 legal counsel present, you are 11 not to testify about the contents 12 of those conversations, only 13 conversations that were not with 14 legal present. 15 THE WITNESS: Okay. 16 A. They would have been with legal 17 counsel present. 18 MS. SLUSARZ: Okay. I'd 19 like to mark another exhibit. 20 One second. 21 --- 22 (Whereupon, Plaintiff's 23 Exhibit 7, a five-page document, 24 was marked for identification.) 25 ---</p>	<p>79</p> <p>1 T. M. SIRACUSA 2 MS. SLUSARZ: All right. 3 Exhibit 7 is in the chat. It is 4 Bates stamped KRIMSKY 65 through 5 KRIMSKY 69. 6 MS. AGRESCI: We're opening 7 up the document now. 8 Okay. The witness has the 9 document, but she's going to look 10 through it first. 11 A. Okay. I've reviewed. 12 Q. All right. Have you seen this 13 document before? 14 A. Yes. 15 Q. And what is this document? 16 A. It's an update on Marshall's 17 performance improvement plan and an 18 extension of it. 19 Q. Okay. And it was extended for 20 30 days? 21 A. Yes. 22 Q. Well, let's take a look at the 23 action items. 24 Did Mr. Krimsky complete a key 25 account plan for Campbell's?</p>

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<p>1 T. M. SIRACUSA 2 A. Yes, with some help. 3 Q. Okay. Did he prepare a detailed 4 plan to achieve \$10 million in sales in 5 fiscal year 2024? 6 A. He prepared a plan. I would not 7 consider it detailed. It was not 8 well-done and unprofessional. 9 Q. Did you provide him with a form 10 of what the business plan should look 11 like? 12 A. So I provided him the 13 opportunity to meet with my sales 14 leader, David Sharp, which he did. And 15 David gave him specific commentary and 16 feedback on how to prepare that. 17 Q. To your knowledge, did Mr. Sharp 18 give him a form that he could use or a 19 template for the business plan? 20 A. I don't know if he provided him 21 anything in writing, but David, 22 afterwards, sent me an outline of what 23 they discussed. 24 Q. Did he send that via e-mail? 25 A. Yes.</p>	<p>81</p> <p>1 T. M. SIRACUSA 2 Q. Do you know if legal counsel was 3 copied on that e-mail? 4 A. I do not know. 5 Q. Okay. Did Mr. Krimsky set up a 6 regular cadence for Teams meetings with 7 the WestRock operation team? 8 A. No. 9 Q. Did he have any meetings with 10 the WestRock operations team during 11 that -- 12 A. No. 13 Q. -- period between January 15, 14 2024 and April 26, 2024? 15 A. He did not set up any meetings 16 with the operations team. 17 Q. Okay. He did complete his 18 training with Microsoft Office and 19 Teams, though, correct? 20 A. Yes. 21 Q. And he did complete his training 22 for Salesforce, correct? 23 A. He says he did. There's no way 24 for me to verify that. 25 Q. What about maintaining an active</p>
<p>83</p> <p>1 T. M. SIRACUSA 2 pipeline in Salesforce? 3 A. He did not do that. 4 Q. Okay. When did you make the 5 decision to terminate Mr. Krimsky's 6 employment? 7 A. At the end of this 30-day 8 extension. 9 Q. So that was around May 26th? 10 MS. AGRETTI: Objection. 11 Form. 12 You may answer. 13 A. Somewhere around that time 14 frame. 15 Q. When did you inform Mr. Krimsky 16 that his employment was terminated? 17 A. I don't recall the exact date. 18 Q. How did you terminate 19 Mr. Krimsky's employment? How did you 20 communicate it to him that his 21 employment was terminated? 22 A. What did I say? 23 Q. No. I mean, was it a 24 face-to-face meeting? Was it a Teams 25 meeting? Was it by telephone?</p>	<p>84</p> <p>1 T. M. SIRACUSA 2 A. It was a Teams meeting with 3 Marshall and our HR manager. 4 Q. Was that Carrie Robards? 5 A. Yes. 6 Q. And what did you say to 7 Mr. Krimsky? 8 A. I don't remember the exact 9 words, but it would have been somewhere 10 along the lines of because he didn't 11 meet the requirements of the 12 performance improvement plan, that we 13 are going to terminate his employment 14 with WestRock. 15 Q. And what did Mr. Krimsky say in 16 response? 17 A. Okay. 18 Q. Anything else? 19 A. He asked about severance. 20 Q. Okay. And was he offered a 21 severance package? 22 A. Yes. 23 Q. What facility do you work out 24 of? 25 A. Atlanta. Our corporate office.</p>

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<p style="text-align: right;">85</p> <p>1 T. M. SIRACUSA 2 MS. SLUSARZ: I'd like to 3 take a short break 'cause I need 4 to print out a document. I'm 5 getting close to the end, so I 6 don't think it makes sense for us 7 to break for lunch right now, but 8 if we can break until 11:55, I'll 9 have the document and I can 10 quickly go through it. 11 MS. AGRETTI: Sounds good. 12 --- 13 (Whereupon, a recess was 14 taken at this time.) 15 --- 16 Q. Okay. I just have a few 17 questions. 18 Ms. Siracusa, why was 19 Mr. Krimsky moved to the position of 20 graphics business manager instead of 21 remaining a sales representative in the 22 corrugated division? 23 A. I don't know exactly the 24 reasoning why, but at the time the 25 plant that he sold for was closed.</p>	<p style="text-align: right;">86</p> <p>1 T. M. SIRACUSA 2 Like WestRock made the decision to 3 close that plant and so there wasn't 4 like a local plant for him to sell for. 5 Q. Okay. Under Mr. Krimsky's 6 compensation plan that started, I 7 guess, October 1, 2022, I believe you 8 testified earlier that he earned less 9 than he earned when he was being paid a 10 commission; is that correct? 11 MS. AGRETTI: Objection. 12 Form. 13 You may answer. 14 A. Yes. 15 Q. Okay. Is your compensation or 16 was your compensation in fiscal year 17 2023 at all tied to the profitability 18 of the merchandising display and 19 graphics solutions business? 20 MS. AGRETTI: Objection. 21 Form. 22 You may answer. 23 A. No. It's tied to the 24 profitability of the company. 25 Q. Okay. Was any aspect of it</p>
<p style="text-align: right;">87</p> <p>1 T. M. SIRACUSA 2 affected by the company paying -- by 3 the company keeping more of the revenue 4 from Pepperidge Farm? 5 MS. AGRETTI: Objection. 6 Form. 7 You may answer. 8 A. Can you repeat the question, 9 please? 10 Q. Was your compensation affected 11 in any way by the fact that the company 12 kept more of its revenue from 13 Pepperidge Farm? 14 MS. AGRETTI: Objection. 15 Form. 16 You may answer. 17 A. I don't know. I don't know 18 exactly how everything is calculated. 19 MS. SLUSARZ: Okay. I don't 20 have any further questions. 21 MS. AGRETTI: We'll take a 22 five-minute break here and see if 23 we have any follow-up. 24 MS. SLUSARZ: Okay. 25 ---</p>	<p style="text-align: right;">88</p> <p>1 T. M. SIRACUSA 2 (Whereupon, a recess was 3 taken at this time.) 4 --- 5 MS. AGRETTI: Defendants do 6 not have any questions. 7 MS. SLUSARZ: Okay. 8 Ms. Siracusa, thank you very 9 much for your time this morning. 10 I hope you have a good rest of 11 your day. 12 THE WITNESS: Thank you. 13 (Time noted: 12:03 p.m.)</p>

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<p style="text-align: right;">89</p> <p>1 T. M. SIRACUSA 2 INSTRUCTIONS TO WITNESS 3 4 Please read your deposition over 5 carefully and make any necessary 6 corrections. You should state the 7 reason in the appropriate space on the 8 errata sheet for any corrections that 9 are made. 10 After doing so, please sign the 11 errata sheet and date it. 12 You are signing same subject to 13 the changes you have noted on the errata 14 sheet, which will be attached to your 15 deposition. 16 It is imperative that you return 17 the original errata sheet to the 18 deposing attorney within thirty (30) 19 days of receipt of the deposition 20 transcript by you. If you fail to do 21 so, the deposition transcript may be 22 deemed to be accurate and may be used in 23 court. 24 25</p>	<p style="text-align: right;">90</p> <p>1 T. M. SIRACUSA 2 - - - - - 3 E R R A T A 4 - - - - - 5 PAGE LINE CHANGE 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">91</p> <p>1 2 A C K N O W L E D G E M E N T 3 STATE OF NEW YORK) 4 :SS 5 COUNTY OF _____) 6 I, TAMMY M. SIRACUSA, hereby certify that I 7 have read the transcript of my testimony taken 8 under oath on July 30, 2024, that the 9 transcript is a true, complete and correct 10 record of what was asked, answered and said 11 during my testimony under oath, and that the 12 answers on the record as given by me are true 13 and correct, except for the corrections or 14 changes in form or substance, if any, noted in 15 the attached Errata Sheet. 16 17 18 _____ 19 20 Signed and subscribed to 21 before me, this _____ day 22 of _____, _____. 23 24 25 _____ Notary Public</p>	<p style="text-align: right;">92</p> <p>1 2 I N D E X O F W I T N E S S E S 3 WITNESS: TAMMY M. SIRACUSA 4 EXAMINATION BY PAGE 5 MS. SLUSARZ 7 6 7 I N D E X O F E X H I B I T S 8 EXHIBIT DESCRIPTION PAGE 9 1 Six-page document 27 10 2 Document 35 11 3 Spreadsheet 50 12 4 Three-page document 57 13 5 Ten-page document 59 14 6 Three-page document 71 15 7 Five-page document 79 16 (*Indicates exhibit(s) retained by counsel) 17 18 I N D E X O F C O N F I D E N T I A L 19 S E C T I O N S 20 21 PAGE LINE 22 12 6 23 33 16 24 40 9 25 66 19</p>

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<p style="text-align: center;">93</p> <p>1 2 C E R T I F I C A T E 3 I, DEVORA HACKNER, a stenographic reporter 4 and Notary Public within and for the State of 5 New York, do hereby certify: 6 That the witness(es) whose testimony is 7 hereinbefore set forth was duly sworn by me, 8 and the foregoing transcript is a true record 9 of the testimony given by such witness(es). 10 I further certify that I am not related to 11 any of the parties to this action by blood or 12 marriage, and that I am in no way interested 13 in the outcome of this matter.</p> <p>14 15 16 17 18 19 20 21 22</p> <p style="text-align: center;">  DEVORA HACKNER Dated: July 30, 2024 </p> <p>23 24 25</p>	<p style="text-align: center;">94</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 10%;">PAGE/LINE</th> <th style="text-align: left; width: 90%;">LAWYER'S NOTES</th> </tr> </thead> <tbody> <tr><td>3</td><td> </td></tr> <tr><td>4</td><td> </td></tr> <tr><td>5</td><td> </td></tr> <tr><td>6</td><td> </td></tr> <tr><td>7</td><td> </td></tr> <tr><td>8</td><td> </td></tr> <tr><td>9</td><td> </td></tr> <tr><td>10</td><td> </td></tr> <tr><td>11</td><td> </td></tr> <tr><td>12</td><td> </td></tr> <tr><td>13</td><td> </td></tr> <tr><td>14</td><td> </td></tr> <tr><td>15</td><td> </td></tr> <tr><td>16</td><td> </td></tr> <tr><td>17</td><td> </td></tr> <tr><td>18</td><td> </td></tr> <tr><td>19</td><td> </td></tr> <tr><td>20</td><td> </td></tr> <tr><td>21</td><td> </td></tr> <tr><td>22</td><td> </td></tr> <tr><td>23</td><td> </td></tr> <tr><td>24</td><td> </td></tr> <tr><td>25</td><td> </td></tr> </tbody> </table>	PAGE/LINE	LAWYER'S NOTES	3		4		5		6		7		8		9		10		11		12		13		14		15		16		17		18		19		20		21		22		23		24		25	
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